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Attorneys for Josias N. Dewey, Court-Appointed
Temporary Receiver

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**DIGITAL LICENSING INC. (d/b/a
“DEBT Box”), a Wyoming corporation;
JASON R. ANDERSON, an individual;
JACOB S. ANDERSON, an individual;
SCHAD E. BRANNON, an individual;
ROYDON B. NELSON, an individual;
JAMES E. FRANKLIN, an individual;
WESTERN OIL EXPLORATION
COMPANY, INC., a Nevada corporation;
RYAN BOWEN, an individual; IX
GLOBAL, LLC, a Utah limited liability
company; JOSEPH A. MARTINEZ, an
individual; BENJAMIN F. DANIELS, an
individual; MARK W. SCHULER, an
individual; B & B INVESTMENT
GROUP, LLC (d/b/a “CORE 1
CRYPTO”), a Utah limited liability
company; TRAVIS A. FLAHERTY, an
individual; ALTON O. PARKER, an
individual; BW HOLDINGS, LLC (d/b/a
the “FAIR PROJECT”), a Utah limited
liability company; BRENDAN J.
STANGIS, an individual; and MATTHEW
D. FRITZSCHE, an individual,**

DECLARATION OF BECKY MCGEE

Case No. 2:23-cv-00482-RJS

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRTZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

**DECLARATION OF BECKY MCGEE IN SUPPORT OF
RECEIVER'S FIRST AND FINAL FEE APPLICATION**

I, Becky McGee, declare and state as follows:

1. I am over the age of majority and have personal knowledge of the matters set forth herein. I am competent in all respects to make the statements set forth in this declaration.
2. I was engaged by Holland & Knight LLP ("H&K") to serve as a consultant to the Court-appointed temporary receiver, Josias N. Dewey ("Receiver"), in the above captioned matter and submit this declaration in support of the Receiver's First and Final Fee Application ("Application").
3. My role as consultant in this matter was focused on work relating to oil and gas assets.
4. I have served as a court-appointed receiver and as a consultant to a receiver in other federal securities fraud cases involving oil and gas assets and related matters. Prior to my roles in

the receivership context, I was Vice President and General Counsel of Hunt Petroleum Corporation and prior to joining Hunt Petroleum, I served in management and legal positions for Oryx Energy Company and Sun Exploration and Production Company. I am an attorney licensed to practice in Texas and I have been Board Certified in Oil, Gas and Mineral Law by the Texas Board of Legal Specialization since 1989. My legal and management experience in the oil and gas area that is relevant to my role in this matter includes a broad range of transactions involving a variety of oil and gas operations and assets located throughout the United States, federal regulatory compliance matters and assessment and preservation of oil and gas assets in a receivership.

5. My current standard hourly rate for work similar to the work I performed in this matter is \$395. However, it has been my practice to charge a discounted hourly rate for work on receivership matters involving SEC securities fraud cases and, in this matter, the discounted hourly rate is \$320.

6. Based on my experience retaining, attempting to retain and working with attorneys in connection with receivership matters and oil and gas matters, I am familiar with hourly billing rates. My discounted hourly rate in this matter is at the low end of the range of competitive market rates for work similar to the work I performed in this matter and, therefore, is a reasonable rate.

Certification of Compliance with SEC Billing Instructions

7. To the best of my knowledge, information and belief formed after reasonable inquiry, all my fees in this matter are true and accurate and comply with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission.

8. The fees in my invoice (attached to the Application as **Exhibit F-4**) are based on the hourly rate listed therein and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

9. No requests for reimbursement are included in my invoice.

I declare under criminal penalty of law of Utah that the foregoing is true and correct.

DATED this 17th day of April, 2024.

/s/ Becky McGee
Becky McGee